



Avery Landing SSSP and QAPP

John M. Herzog

to:

Earl Liverman

08/30/2011 03:50 PM

Cc:

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2 Attachments



Avery Landing QAPP_083011.pdf Avery Landing SSSP_083011.pdf

Earl,

Attached, please find the final SSSP and QAPP for the additional characterization of the Potlatch portion of the Avery Landing site. We appreciate your review and have revised this document in in general accordance with your comments.

Specific responses to EPA comments are as follows:

- **EPA Comment:**

SSSP, Section 1.0, page 1. EPA need not provide written approval of the Avery Landing SSSP; rather, EPA will concur with the document provided the following comments are addressed.

- **Response:**

The SSSP has been updated to remove the word "Approval."

- **EPA Comment:**

SSSP, Section 4.0, page 3. EPA requested submission of a final report on or about 1 November 2011. Please revise the estimated completion date for submission of a final report to 1 November 2011. Also refer to QAPP Table A6.2.

Response:

The referenced tables have been updated to indicate a report will be provided to EPA by 1 November 2011.

- **EPA Comment:**

SSSP, Section 5.0, page 3, 3rd paragraph, last sentence. Please delete "remedial actions" and substitute "removal actions."

Response: "Remedial actions" has been replaced with "removal actions."

- **EPA Comment:**

QAPP, Table 2. Require the laboratory to report MDLs and Reporting Limits for the Aroclors 1221 - 1254 since they are listed as "not available" in Table 2.

Response: We have contacted the laboratory regarding this issue and they responded. Table 2 in the QAPP has been updated with a footnote clarifying the laboratory's standard procedures for limit-of-detection (LOD) studies for PCBs.

- **EPA Comment:**

QAPP, Section D1. The degree of data validation needs to be documented by applying additional qualifiers to the data. This needs to follow: "Guidance for Labeling Externally Validated Laboratory Analytical Data for Superfund Use" (EPA 540-R-08-005). Based on the information in Section D1, it looks like the data review will be consistent with either a Stage "2A" or "2B" validation.

Response:

Section D1 of the QAPP has been updated to indicate that a Stage 2B validation will be performed on the data in general accordance with the referenced document.

- **EPA Comment:**

QAPP Section D1. Why not directly refer to the use and application (where relevant) of the EPA Functional Guidelines for Data Validation in Sections D1 or D2? The citations for these guidelines are provided in the references section but they are not referred to where data validation processes are documented.

Response:

The referenced documents have been added to the text of Section D1.

We are still hammering out the details of the sampling plan on the week of the 19th and will give you the specifics when they are finalized – at present we are still looking at doing the field work between Tuesday and Thursday of that week.

Please let me know if you have any questions.
Thank you.

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